

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

MICHELLE ANN BOESCH

Debtor

Case No. 19-46095-MBM

Chapter 7

Honorable MARCI B. MCIVOR

**RESPONSE TO TRUSTEE'S OBJECTION TO DEBTORS CLAIM OF
EXEMPTIONS**

NOW COME Debtor MICHELLE ANN BOESCH, by and through her counsel, KAREN E. EVANGELISTA, P.C., and in response to the Trustee's Objection to Debtors' Claim of Exemptions, states as follows:

1. Debtor filed a Chapter 7 proceeding with this Honorable Court as recognized by the Trustee in his Counsel's objection. The Debtor also acknowledges that Homer W. McClarty is the appointed Trustee in this case.
2. The Debtor recognizes that the specific provisions of the Bankruptcy Code stated in the Trustee's counsel's objection in his "argument", specifically paragraphs 10 to 14 are true and do not need a response. The Debtor also recognizes that to the extent there is non-exempt equity in cash, bank accounts and tax refunds, these are subject to turnover to the Trustee.
3. The Debtor states that all the retirement accounts listed in the Debtors' schedules are exempt as the Trustee and his counsel know. Trustee's

counsel has been practicing long enough to know that ANY objection to an exemption in these accounts is without merit.

4. The Debtor turned over all relevant documents to the Trustee prior to the 341 pursuant to 11 USC 521. Any other relevant documents requested by his counsel shall be turned over forthwith.

5. The undersigned made attempts to contact counsel for the Trustee on 3 separate occasions prior to having filed this response to avoid unnecessary expense to the Estate, the Debtor or to the Court. Those attempts were not returned.

WHEREFORE, Debtors pray this Honorable Court deny the relief requested by Trustee, and award her such other and further relief as this Court deems just.

Respectfully submitted:
KAREN E. EVANGELISTA, P.C.

/s/ Karen E. Evangelista (P36144)
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